

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**DENISE HAMLETT,**

**Plaintiff,**

**v.**

**TRANS AMERICAN INFORMATION  
SYSTEMS, INC. d/b/a Mastek**

**Defendant.**

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**CIVIL ACTION NO. 3:21-CV-775**

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**DEFENDANT’S OPPOSED MOTION FOR A ONE-WEEK  
EXTENSION OF THE DISPOSITIVE MOTION DEADLINE  
AND REQUEST FOR EXPEDITED RULING**

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COMES NOW, Defendant Trans American Information Systems, Inc. d/b/a Mastek (“Defendant” or “Mastek” ) and files this Opposed Motion for a One-Week Extension of the Dispositive Motion Deadline and Request for Expedited Ruling (the “Motion”). As good cause for the Motion, Defendant states as follows:

**GROUND FOR MOTION**

1. Pursuant to the Court’s order [Doc. 14], the dispositive motion deadline is May 6, 2022.
2. Mastek seeks a one-week extension of the dispositive motion deadline from May 6, 2022 to May 13, 2022.
3. Good cause exists for this Motion. The undersigned counsel, Lauren L. Mitchell, contracted COVID-19 the week of April 18, 2022, from which she is still recovering. Her last positive COVID-19 test was April 24, 2022.

4. Mastek plans to file a dispositive motion. Ms. Mitchell is the attorney representing Mastek who is responsible for drafting Defendant's dispositive motion. Ms. Mitchell has been unable to draft Defendant's dispositive motion during her COVID-19 illness.

5. Even prior to Ms. Mitchell's illness, Mastek's timeline to draft its dispositive motion was condensed by the parties' agreement to take two depositions after discovery closed on April 8, 2022, in order to accommodate conflicting schedules:

- Kapil Malik was deposed on April 13, 2022, by Plaintiff.
- Tammy Moore was deposed on April 12, 2022, by Defendant.

6. Pursuant to Local Rule 7.1, counsel for Mastek, Lauren L. Mitchell, conferred with Megan Dixon, counsel for Plaintiff, on April 26, 2022, regarding the substance of this Motion. Plaintiff is *opposed* to the relief requested in this Motion.<sup>1</sup>

7. This is Mastek's first request for an extension of the dispositive motion deadline.

8. This request is not sought for purposes of delay but so that justice may be done. Mastek anticipates that the requested one-week extension will not disrupt the scheduled trial or prejudice any party.

### **REQUEST FOR RELIEF**

Trans American Information Systems, Inc. d/b/a Mastek respectfully requests that the Court grant this Motion and extend the dispositive motion deadline until May 13, 2022.

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<sup>1</sup> Plaintiff's counsel did not state any basis for her opposition that would suggest prejudice to Plaintiff could occur if this Motion was granted. Instead, Plaintiff's counsel stated as follows:

*I am opposed to an extension of the dispositive motion deadline. While I am sympathetic to Lauren's issues, Mastek has had ample time to draft a dispositive motion and the delays have been caused by Defendant's resistance to engage in discovery until the last minute.*

Date: April 26, 2022

Respectfully submitted,

By: /s/Lauren L. Mitchell

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**COUNSEL FOR DEFENDANT TRANS  
AMERICAN INFORMATION  
SYSTEMS, INC. D/B/A MASTEK**

### **CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with Megan Dixon, counsel for Plaintiff, via e-mail on April 26, 2022, regarding the requested relief. Counsel for Plaintiff indicated that Plaintiff is opposed to the relief sought in this motion.

/s/Lauren L. Mitchell

Lauren L. Mitchell

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record via the Court's electronic filing system, pursuant to the Federal Rules of Civil Procedure on April 26, 2022.

/s/Lauren L. Mitchell

Lauren L. Mitchell

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